

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NATIONAL FOOTBALL LEAGUE;
NFL PROPERTIES LLC

Plaintiffs,

v.

CHEN CHENG, d/b/a
NFLJERSEYDISCOUNT.COM; ZHIWEI
HUANG, d/b/a NFLJERSEYTRADE.COM;
LIN HONG, d/b/a NFLJERSEYSHOP.COM,
et al.

Defendants.

CASE NO. 11 CIV. 0344 (WHP)

**PLAINTIFFS' APPLICATION FOR A
DEFAULT JUDGMENT AND
PERMANENT INJUNCTION ORDER**

Pursuant to Federal Rule of Civil Procedure 55, Plaintiffs THE NATIONAL FOOTBALL LEAGUE and NFL PROPERTIES LLC (collectively, "Plaintiffs") hereby apply to the Court for a Default Judgment and Permanent Injunction Order against CHEN CHENG, d/b/a NFLJERSEYDISCOUNT.COM; ZHIWEI HUANG, d/b/a NFLJERSEYTRADE.COM d/b/a NFLJERSEY.CC; LIN HONG, d/b/a NFLJERSEYSHOP.COM; LIN ZHI XIONG, ZHIXIONG ZHIXIONG, d/b/a 21NFL.COM; CHENGGUI, d/b/a ANYJERSEYS.COM; RUIRUN LIN, d/b/a BIZNFL.COM; CHENBAO, d/b/a CHEAPJERSEYSCHINA.COM; FENG GUILUAN, FENG XS, d/b/a CHINA-CHEAP.COM; WAN ZHONG MO, d/b/a UCHOOSEJERSEYS.COM; YAOHUIPEI, d/b/a JERSEYMALL2008.COM; WENG YIXIN, d/b/a JERSEYOK.COM; WN13774784T, d/b/a JERSEYSHOP.US; LIN ZHENDONG, d/b/a JERSEYS-SHOES.COM; LIN FEI, d/b/a JERSEYSSHOPS.COM; PAN HAICHUAN, d/b/a JERSEYSTRADING.COM; HONG WU, QUAN ZHOU SHI FENG ZE QU, d/b/a LIKEFOOTBALLJERSEY.COM; AFDASF, d/b/a LIVEJERSEYS.COM; SHIMANYANG SMY, d/b/a MLB-NFLJERSEYS.COM; RUAN FA, d/b/a NFL4JERSEYS.COM; LINHUA YANG, d/b/a NFL911.COM; XIULONG CHEN, d/b/a

NFLCOLTSSHOP.COM; ANDY, d/b/a NFLCUSTOMJERSEYS.COM; WU SI, d/b/a
NFLJERSEYCLOTHES.COM; LIN XIANJIN, d/b/a NFLJERSEYNFL.COM; FEISHUANG LIN,
d/b/a NFLJERSEYS09.COM; LINJUAN ZHEN, NFLJERSEYS8.COM; GUI JIANG HUANG,
d/b/a NFLJERSEYSSHOP.US; YUZHAO RAO, d/b/a NFLJERSEYSWORLD.US; FANG GUI,
d/b/a NFLJERSEYWELL.COM; IFASTBUY, LTD., d/b/a NFLJERSEYS.COM; ZHIQIANG
GAO, d/b/a NFLNHLJERSEYS.US; BOYI ZHANG, CAOJI ZHANG, d/b/a
NFLNHLSHOP.COM; JINHAI XUE, d/b/a NFL-TRADE.COM; FEI XU, d/b/a
NHLJERSEYS.US; ZHENG ZHOU, d/b/a OKNFLJERSEYS.COM; TIEYONG WU, d/b/a
ONLINEJERSEYSWORLD.COM; ALLEN CHEN, d/b/a PITTSBURGH-JERSEYS.COM;
ZHANG XINGMING, d/b/a REALJERSEYSTORE.COM; RAO QIBIN, d/b/a REEBOK-
JERSEYS.COM; JINXI KE, KE JIN XIAN, d/b/a SALEJERSEYS.COM; SSS TRADE, d/b/a
SHOESSELLING.COM and XIE GUOQIANG, d/b/a SHOPNFL.NET (collectively, "Defaulting
Defendants") based on the supporting Memorandum of Law and Affidavit of Scott Gelin,
submitted herewith. Plaintiffs respectfully request that the Court enter a Default Judgment and
Permanent Injunction against each Defaulting Defendant. A Proposed Default Judgment and
Permanent Injunction Order is submitted herewith.

Dated: February 28, 2011

Respectfully submitted,

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